

To: Federal Communications Commission

Subject: Comments of ET Docket No. 03-104

As a registered professional engineer (EE), with thirty five years in the electric utility industry, fifty two years a licensed amateur radio operator, and having an FCC first-class radiotelephone license, I have serious doubts about the technical feasibility and economic success of BPL. My concern is best expressed and supported in the NOI response comments filed by both the NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION (NTIA) and the AMERICAN RADIO RELAY LEAGUE (ARRL).

Moreover, drawing on my background in both electric power distribution systems and radio-frequency engineering design and performance, I maintain that the technical, economic, and public-relations problems on the horizon--with BPL implementation--are a potential nightmare for 2-30 mHz spectrum stakeholders, for the rural electric cooperatives as well as for the utility sector in general.

I strongly urge the FCC to take seriously the caveats presented by the various entities, in your evaluation of BPL.

Respectfully submitted,

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